

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VILMA REYES and PATRICIA MARTINEZ,
on behalf of themselves and all other
employees similarly situated,

Plaintiffs,

v.

SJ SERVICES, INC., SHAWN SHEA, and
DAVID SHEA,

Defendants.

C.A. No. 1:12-cv-11715-DPW

**ASSENTED TO MOTION OF AMICUS CURIAE SEIU LOCAL 615 TO EXTEND TIME
FOR FILING BRIEF TO FEBRUARY 11, 2013**

Local 615 of the Service Employees International Union (“the Union”) respectfully requests that its time to file a reply to Defendants’ motion to dismiss be extended from February 8, 2013 to February 11, 2013. In support of this request, the Union states:

1. A blizzard is forecasted for the Boston area for today and tomorrow;
2. The offices of Union’s counsel has been closed because of the forecasted blizzard;
weather;
3. The United States District Court for the District of Massachusetts has also announced that the Court will be closed as of noon today due to the inclement weather.
4. Plaintiffs have also requested that this Court extend the deadline for Plaintiffs’ Response to Defendants’ Motion to Dismiss Plaintiffs’ First Amended Complaint until Monday, February 11, 2013.

5. Defendant's reply to both briefs would then be due on February 25, 2013.
6. This brief extension would have no impact on the hearing on these matters currently scheduled for March 27, 2013.
7. Defendant has assented to the Union's request.

Respectfully submitted,

SERVICE EMPLOYEES INTERNATIONAL
UNION, LOCAL 615

By its attorneys,

/s/ Indira Talwani
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Dated: February 8, 2013

CERTIFICATE OF COMPLIANCE WITH RULE 7.1

I hereby certify that I conferred by e-mail with Barry Miller, counsel for the Defendant, on February 8, 2013, and Mr. Miller has assented to this request.

/s/ Indira Talwani

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 8, 2013.

/s/ Indira Talwani